Testimony of William F. Henderson III
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Communications Workers of America

Opposing Proposed Bill:

SB 447 – AN ACT MODERNIZING THE STATE'S TELECOMMUNICATIONS LAWS

ENERGY & TECHNOLOGY COMMITTEE
March 2012

Senator Fonfara, Representative Nardello, members of the committee: my name is William Henderson III. I am proud to serve as the President of Communications Workers of America Local 1298, representing more than 4,000 telecommunications workers across New England.

I am here to speak in opposition to SB 447 – AN ACT MODERNIZING THE STATE'S TELECOMMUNICATIONS LAWS.

I can appreciate the intent of SB 447, which I imagine is meant to eliminate bureaucratic requirements and update procedures to reflect the era of electronic communications and use of the internet.

But it is also the case that corporate entities like AT&T would see true modernization of state legislation including the sweeping away of any regulations or statutory obligations on their part, and little or no reporting requirements. CWA Local 1298 is reluctant to allow AT&T to become less regulated, and for this reason we oppose this bill.

It is certainly the case that many of the current regulations affecting AT&T and its predecessors were enacted in a different era, when they had complete monopoly status. This was also a period during which we had thousands of good, union-represented jobs, through which Connecticut AT&T workers proudly served Connecticut AT&T customers.

We have seen a drastic transformation of the business sector, and AT&T itself in recent years, and have seen hundreds of jobs disappear from our state in the process – even with significant regulatory obligations on the company.

There is nothing in AT&T's record over the past ten years to inspire anyone's confidence that less regulation or oversight will make AT&T a better corporate citizen, or more faithful employer.

Most objectionable in the proposed bill is Sec. 5, which changes the requirements of Section 16-247m of the general statutes, and allows a telecommunications service to simply give notice before withdrawing from a retail provision of a telecommunications service – rather than applying to PURA for permission, as is now the case.

The change presumes consent unless there is an objection. At AT&T hundreds of Connecticut jobs could be affected, with automatic concurrence by the state, unless an objection is upheld. This creates greater jeopardy for employees than a process in which an application must be submitted, reviewed and approved.

Likewise with provisions that do away with annual audits by the state or the requirement to submit annual tariffs for services. We submit that such oversight requirements have mitigated the extent of corporate job cuts in our state. But even with such protections, Connecticut AT&T workers have been put through the meat grinder. We see NO advantage to making it easier for AT&T to escape its obligations by downplaying the state's scrutiny of its actual performance.

Along with my testimony I am submitting records from the Public Utilities Regulatory Authority and its DPUC predecessor that document 84 months of AT&T failure to comply with minimal state standards. There are two ways to deal with such an abysmal record of service – either continually pursue AT&T to bring their performance up to an adequate level, or to lower the standards to suit AT&T's poor showing.

In my view, though I am sure that is not its intention, that is what SB 447 does – lower expectations to match poor service rather than demanding service that meets state standards.

The same is true of the proposed amendment to Sec. 12, which effectively lowers the standards for workers coming in from out-of-state to perform telecommunications electrical work during a declared disaster. Though the language may seem in an ideal setting to allow more rapid response to real emergency situations, it would undoubtedly be employed by AT&T to further erode the jobs of union-represented Connecticut AT&T workers in favor of less qualified, cheaper subcontractors from other states.

AT&T has taken advantage of any wiggle room in regulations too many times for CWA Local 1298 to be comfortable giving them more leeway.

It is true that AT&T is no longer an "absolute" monopoly. But it is the default landline for the state, and by far the biggest telecommunications provider in Connecticut. It is right that this special status carries with it obligations to its customers, its employees and the people of Connecticut.

Now is not the time to diminish those obligations, or otherwise make it easier for AT&T to get rid of its skilled and experienced Connecticut workforce.

Thank you for allowing me to testify on this legislation.

SEMI-ANNUAL PERFORMANCE REPORT
(FOR July 2010 - December 2010)

REPORTS PER HUNDRED NETWORK ACCESS LINES

STATEWIDE	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC	JULY-DEC AVERAGE
COMPANY	2.25	1.51	1.33	1.17	1.56	1.13	1.28	1.33
ADMIN. AREA								
New Haven/Berkshire	2.25	1.57	1.39	1.20	1.55	1.16	1.37	1.37
Bridgeport/Gateway	2.25	1.35	1.14	1.10	1.43	1.02	1.18	1.20
Capitol	2.25	1.23	1.18	1.02	1.53	1.04	1.22	1.21
East	2.25	1.86	1.55	1.36	1.76	1.28	1.28	1.52

For the period of July through December 2010, the Company exceeded the minimum standard performance requirement each month for the Reports per Hundred Lines measure.

WIRE CENTER RPHL RESULTS

(FOR July 2010 - December 2010)

WIRE CENTER	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC
BALTIC	2.25	1.49	1.57	1.58	1.34	0.96	1.46
BERLIN	2.25	1.39	1.35	1.42	1.68	1.09	1.44
BETHANY	2.25	2.05	2.15	1.97	1.76	1.57	2.40
BETHLEHEM	2.25	2.27	1.70	2.38	3.25	2.59	1.15
BLOOMFIELD	2.25	1.51	1.74	1.39	1.93	1.25	2.44
BRANFORD	2.25	1.67	1.45	1.11	1.50	1.09	1.36
BRIDGEPORT	2.25	0.90	0.75	0.76	0.92	0.70	0.94
BRIDGEPORT NORTH	2.25	1.42	1.73	0.93	1.40	1.06	1.62
BRISTOL	2.25	3.51	1.78	1.43	2.18	1.48	1.48
BROOKFIELD	2.25	1.12	0.88	1.06	1.31	0.85	1.35
CANAAN	2.25	2.35	1.31	1.02	1.47	1.07	0.93
CANTON	2.25	1.56	1.88	1.29	2.66	1.47	3.00
CANTERBURY & PLAINFIELD	2.25	1.56	1.46	2.31	1.82	1.51	1.53
CHESHIRE	2.25	1.46	1.09	1.27	1.55	1.05	1.08
CLINTON	2.25	1.97	1.67	1.98	1.70	1.93	0.96
COLCHESTER	2.25	2.84	2.43	1.61	2.05	1.05	1.48
COLUMBIA	2.25	1.45	1.63	0.96	2.19	2.89	1.50
CORNWALL	2.25	3.29	2.92	1.51	1.62	1.34	1.93
COVENTRY	2.25	2.19	1.41	1.01	1.74	1.23	0.98
CROMWELL	2.25	1.21	1.30	0.83	1.24	1.21	0.89
DANBURY	2.25	1.32	1.38	1.10	1.42	1.02	1.41
DANIELSON	2.25	2.04	2.15	1.73	2.00	1.37	1.44
DARIEN	2.25	1.23	1.05	1.06	1.52	1.34	1.04
DEEP RIVER	2.25	1.60	1.77	1.66	1.87	1.48	1.33
DERBY	2.25	1.28	1.28	1.07	1.36	1.05	1.29
DURHAM	2.25	2.03	1.21	1.47	1.82	1.64	2.48
EAST HAMPTON	2.25	3.48	1.86	1.56	2.33	1.27	1.65
EAST HARTFORD 1	2.25	0.89	0.76	0.71	1.07	0.72	0.76
EAST HARTFORD 2	2.25	1.26	1.07	0.94	1.89	1.27	1.42
EAST HAVEN	2.25	1.43	1.40	1.44	1.59	0.97	1.62
ENFIELD	2.25	1.03	1.17	0.95	1.34	0.86	1.10
ESSEX	2.25	1.87	1.22	1.34	1.55	0.79	0.80

WIRE CENTER RPHL RESULTS

(FOR July 2010 - December 2010)

WIRE CENTER	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC
FAIRFIELD	2.25	1.37	1.03	0.92	0.99	1.43	1.17
FARMINGTON	2.25	1.43	1.09	0.93	2.24	0.88	1.11
GEORGETOWN	2.25	1.37	1.31	7.59	1.48	0.83	0.84
GLASTONBURY	2.25	1.13	0.61	0.80	1.27	1.00	1.28
GOSHEN	2.25	3.20	1.45	1.54	2.60	1.31	1.24
GRANBY	2.25	0.99	1.00	0.87	2.55	1.29	1.69
GROTON	2.25	0.85	0.76	0.59	0.75	0.73	0.49
GUILFORD	2.25	1.86	1.52	1.19	1.61	1.49	1.82
HAMDEN	2.25	1.13	1.18	1.33	1.28	1.18	1.54
HAMPTON	2.25	2.45	1.54	1.84	2.65	1.97	2.12
HARTFORD	2.25	0.77	1.16	0.68	1.04	0.83	0.89
HAZARDVILLE	2.25	1.40	1.32	0.98	1.01	1.02	1.29
HIGGANUM	2.25	2.05	1.99	1.73	2.74	1.64	1.66
HUNTINGTON	2.25	1.85	1.17	1.33	2.15	1.49	1.20
JEWETT CITY	2.25	1.49	1.41	1.32	2.26	1.09	1.30
KENT	2.25	2.90	1.39	1.45	2.00	1.28	0.93
LAKEVILLE	2.25	1.93	1.37	1.09	1.99	1.56	0.80
LEBANON	2.25	1.69	1.95	1.65	1.92	1.06	1.58
LEDYARD-EAST	2.25	2.13	1.80	1.44	1.84	1.11	1.34
LITCHFIELD	2.25	1.86	1.66	1.74	2.32	0.95	1.42
LYME	2.25	2.81	2.31	3.10	5.58	1.34	1.86
MADISON	2.25	1.52	1.71	3.31	1.72	1.04	1.48
MADISON-NORTH	2.25	2.79	2.29	2.67	2.84	3.00	3.55
MANCHESTER	2.25	1.13	1.07	1.15	1.31	1.04	1.14
MARLBOROUGH	2.25	2.59	1.18	1.87	1.90	0.77	0.90
MERIDEN	2.25	1.13	1.15	0.88	1.50	1.06	1.28
MIDDLEBURY	2.25	1.28	1.06	1.15	1.89	1.27	1.23
MIDDLETOWN	2.25	1.30	1.07	0.90	0.94	0.96	0.88
MILFORD	2.25	1.73	1.42	1.09	1.35	1.11	1.23
MONTVILLE & LEDYARD	2.25	4.75	1.78	1.69	2.00	1.48	1.29
MOODUS	2.25	2.56	1.67	2.03	2.49	1.43	1.77

WIRE CENTER RPHL RESULTS

(FOR July 2010 - December 2010)

WIRE CENTER	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC
MYSTIC	2.25	1.64	1.69	1.63	2.24	1.30	1.38
NAUGATUCK	2.25	1.43	1.49	0.81	1.37	0.99	1.21
NEW BRITAIN	2.25	1.04	0.96	1.02	1.22	1.12	1.29
NEW CANAAN	2.25	2.00	1.54	1.88	2.13	1.79	1.48
NEW FAIRFIELD	2.25	1.44	1.55	1.20	1.33	1.07	1.41
NEW HAVEN	2.25	0.96	0.70	0.67	0.78	0.83	1.17
NEWINGTON	2.25	1.19	1.13	1.09	1.17	0.90	1.53
NEW LONDON	2.25	1.31	1.48	1.28	1.73	1.80	1.22
NEW MILFORD	2.25	2.47	1.94	1.72	2.84	1.48	1.72
NEWTOWN	2.25	1.54	1.22	1.02	1.56	1.21	1.26
NIANTIC	2.25	2.46	1.50	1.27	1.69	1.57	1.31
NORFOLK	2.25	1.56	1.85	1.17	2.96	1.49	1.99
NORTH BRANFORD	2.25	1.50	1.55	1.50	1.59	1.43	1.39
NORTH HAVEN	2.25	1.52	1.46	1.40	1.99	1.55	1.72
NORWALK	2.25	1.34	1.15	0.99	2.22	0.96	1.17
NORWALK-NORTH	2.25	1.14	1.04	0.77	1.59	1.02	1.34
NORWICH	2.25	1.76	1.59	1.12	1.68	1.03	1.20
OLD GREENWICH	2.25	1.30	0.92	1.45	1.13	0.96	1.25
OLD SAYBROOK	2.25	1.50	0.84	0.74	1.10	0.83	0.87
ORANGE	2.25	1.51	1.53	1.63	1.87	1.45	1.65
PLAINVILLE	2.25	1.86	1.77	1.18	1.74	1.32	1.61
PORTLAND	2.25	2.01	1.32	1.26	1.45	1.34	1.26
PROSPECT	2.25	1.24	1.89	1.20	1.73	1.13	1.41
PUTNAM	2.25	3.60	1.39	1.31	1.52	1.10	0.96
PUTNAM NO. & NO.THOMPSON	2.25	2.91	2.39	1.91	2.52	1.79	2.65
REDDING	2.25	2.21	2.04	2.23	2.58	1.97	2.84
RIDGEFIELD	2.25	1.37	1.32	1.03	1.48	1.12	1.40
ROCKVILLE	2.25	1.21	1.20	1.11	1.47	0.96	0.79
SEYMOUR	2.25	1.91	2.12	1.60	2.31	1.63	1.33
SHARON	2.25	2.63	2.29	1.43	1.71	1.41	2.05
SIMSBURY	2.25	1.59	1.57	1.24	1.78	0.93	0.89
SOUTHBURY	2.25	1.83	1.88	1.26	1.68	1.33	1.18

WIRE CENTER RPHL RESULTS

(FOR July 2010 - December 2010)

WIRE CENTER	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC
SOUTHINGTON	2.25	1.52	1.75	1.60	2.07	1.46	1.59
STAFFORD SPRINGS	2.25	1.53	1.54	2.27	2.38	2.10	1.34
STAMFORD	2.25	0.84	0.80	0.68	0.79	0.61	0.62
STAMFORD-NORTH	2.25	1.66	1.21	1.40	1.62	1.02	1.51
STONINGTON	2.25	1.95	2.19	1.55	1.75	1.60	2.92
STORRS	2.25	1.35	2.37	1.54	2.16	1.19	1.31
STRATFORD	2.25	1.26	0.84	0.87	1.25	0.90	1.20
SUFFIELD	2.25	2.23	1.05	1.05	1.87	1.14	1.08
THOMASTON	2.25	3.36	2.48	1.56	1.76	1.14	1.25
TORRINGTON	2.25	1.43	1.21	1.27	1.44	1.08	1.14
TRUMBULL	2.25	1.52	1.32	1.14	1.84	1.15	1.74
UNIONVILLE	2.25	2.49	1.60	1.20	3.59	1.52	1.19
WALLINGFORD	2.25	1.70	1.74	1.02	1.36	1.16	1.43
WAPPING	2.25	1.03	1.59	1.26	1.55	1.04	1.27
WASHINGTON	2.25	2.03	2.98	1.81	2.98	1.74	1.72
WATERBURY	2.25	1.15	1.14	0.93	1.36	0.95	0.97
WATERTOWN	2.25	1.36	1.43	0.99	1.29	1.02	1.33
WESTBROOK	2.25	1.39	1.34	0.72	1.43	1.11	1.18
WEST HARTFORD 1	2.25	1.26	1.22	1.04	1.36	0.97	1.07
WEST HARTFORD 2	2.25	1.08	1.15	1.55	1.64	1.03	1.26
WEST HAVEN	2.25	1.24	1.08	1.20	1.40	1.03	1.15
WESTPORT	2.25	1.80	1.19	1.26	1.25	0.81	1.14
WESTVILLE	2.25	1.28	1.29	1.27	1.50	1.08	1.33
WETHERSFIELD	2.25	1.10	1.13	0.92	1.44	1.22	1.55
WILLIMANTIC	2.25	1.28	1.74	1.21	1.28	0.81	1.23
WILTON	2.25	2.26	1.88	2.26	2.78	1.44	1.82
WINDSOR	2.25	2.03	1.22	1.11	1.66	1.39	1.13
WINDSOR LOCKS	2.25	1.27	1.39	0.98	1.29	0.84	1.10
WINSTED	2.25	1.67	1.53	1.42	1.58	1.16	1.00
WOLCOTT	2.25	1.92	1.67	1.09	2.00	1.43	1.35
WOODBURY	2.25	0.96	1.56	1.05	1.35	1.04	0.97
WOODSTOCK	2.25	2.24	1.97	1.64	2.02	1.74	2.34

SEMI-ANNUAL PERFORMANCE REPORT
(FOR July 2010 - December 2010)

MAINTENANCE APPOINTMENTS MET

STATEWIDE	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC	JULY-DEC AVERAGE
COMPANY	90.0%	92.3%	93.2%	94.9%	94.6%	94.3%	94.0%	93.8%
ADMIN. AREA								
New Haven/Berkshire	90.0%	93.7%	93.5%	94.9%	94.6%	93.8%	94.5%	94.2%
Bridgeport/Gateway	90.0%	93.5%	95.6%	95.3%	96.3%	95.1%	93.4%	94.8%
Capitol	90.0%	91.2%	90.4%	94.0%	94.6%	93.7%	94.0%	93.0%
East	90.0%	89.8%	93.2%	95.8%	93.2%	95.4%	93.5%	93.2%

For the period of July through December 2010, the Company exceeded the minimum standard performance requirement each month for the Maintenance Appointments Met measure.

INSTALLATION APPOINTMENTS MET

STATEWIDE	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC	JULY-DEC AVERAGE
COMPANY	90.0%	99.2%	99.5%	99.6%	99.7%	99.6%	99.7%	99.5%
ADMIN. AREA								
New Haven/Berkshire	90.0%	99.6%	99.7%	99.8%	99.6%	99.6%	99.8%	99.7%
Bridgeport/Gateway	90.0%	99.4%	99.8%	99.6%	99.8%	99.6%	99.7%	99.6%
Capitol	90.0%	99.5%	98.9%	99.6%	99.7%	99.6%	99.6%	99.5%
East	90.0%	98.0%	99.7%	99.8%	99.8%	99.7%	99.7%	99.4%

For the period of July through December 2010, the Company exceeded the minimum standard performance requirement each month for the Installation Appointments Met measure.

SEMI-ANNUAL PERFORMANCE REPORT
(FOR July 2010 - December 2010)

INSTALLATION INTERVAL (COMPLETED WITHIN 5 DAYS) *

STATEWIDE	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC	JULY-DEC AVERAGE
COMPANY	95.0%	96.8%*	96.8%*	97.6%	97.2%	94.5%	96.2%	96.5%
ADMIN. AREA								
New Haven/Berkshire	95.0%	97.5%	96.9%	98.1%	97.1%	99.0%	97.5%	97.6%
Bridgeport/Gateway	95.0%	96.8%	97.2%	96.7%	97.5%	100.0%	94.6%	97.1%
Capitol	95.0%	96.0%	95.6%	97.4%	97.3%	100.0%	94.6%	96.8%
East	95.0%	95.3%	96.7%	96.4%	96.2%	100.0%	96.6%	96.8%

For the period of July through December 2010, the Company exceeded the minimum standard performance requirement for the Installation Interval measure for five months, missing the Objective of 95.0% in November (94.5%).

** A review of the 2010 installation interval data determined that duplicate orders were erroneously included in the query used for the 2010 reporting results. The query error has been corrected and the Company is restating its statewide results for July and August 2010 of this reporting period as shown above, and also Jan – Jun 2010 as follows: Jan 97.5%, Feb. 97.7%, Mar 97.2%, Apr. 97.6%, May 97.7%, and Jun 98.0%. The original reported results adversely impacted the Company in its 2010 Annual Price-Cap filing. The updated 2010 results reveal that the Company exceeded the installation interval objective of 95% or greater during January – March 2010 and therefore would not have had to include the installation interval as a missed metric in the Q-factor in the 2010 Price Cap filing. AT&T is forgoing any adjustments to its 2010 Price Cap filing but is restating its 2010 results for the entire year in this report to accurately reflect its 2010 service performance for the Installation Interval retail standard.*

OOS REPAIR CLEARED WITHIN 24 HOURS

STATEWIDE	OBJ.	JULY	AUG	SEPT	OCT	NOV	DEC	JULY-DEC AVERAGE
COMPANY	90.0%	55.0%	61.8%	63.3%	49.9%	58.8%	50.0%	56.1%
ADMIN. AREA								
New Haven/Berkshire	90.0%	57.2%	55.1%	63.6%	48.2%	53.8%	47.2%	54.0%
Bridgeport/Gateway	90.0%	53.9%	76.4%	63.5%	50.6%	57.4%	47.9%	57.9%
Capitol	90.0%	59.5%	64.9%	63.0%	53.2%	54.9%	55.6%	58.2%
East	90.0%	48.5%	59.8%	62.9%	49.3%	73.1%	52.1%	56.6%

For the period of July through December 2010, the Company did not achieve the minimum standard performance requirement of 90.0% for OOS Repair Cleared within 24 Hours.

The last six months of weather has been unusual with almost every month experiencing a significant event. July was not only one of the warmest on record with two heat waves, but it included severe storms and microburst type storms. Brief tornado touch downs were reported on July 21st in the northern part of the state producing 100 mph winds uprooting trees and even snapping some in half. As troubles increased, AT&T responded to weather conditions and spent over 3 million dollars in over time in June and July. August and September were relatively warm months with temperatures ranging from a high of 97 degrees to a low of 39 degrees. Again, severe storms passed through the state with heavy rainfall and high winds. On August 22nd a major storm caused flooding in some areas with power lines down as well as trees. On September 30th, Tropical Storm Nicole arrived with high winds which again caused flooding and downed power lines. October's performance was severely impacted by the lingering effects of Storm Nicole with a surge in reported troubles, which on one date, reached 3900 statewide, compared to the normal of 800. In November, the state again experienced heavy rainfall and high winds. On December 26th, the state experienced its first storm of the winter season bringing blizzard conditions, coastal flooding and wind gusts of up to 60 mph. The Governor urged people to stay off the roads. All of these storms resulted in treacherous travel conditions and roads in some areas were even closed as a result of damage. Along with these storm events, greatly impacting the Company's ability to meet the metric, AT&T also continues to work with technicians on the usage of a new Dispatch System implemented earlier in 2010. In addition, as reported in Monthly Exception Reports, AT&T's results do not reflect weather and other exclusions used in other jurisdictions and AT&T uses a conservative methodology to calculate its results.

Employee Input: AT&T Installation & Maintenance ("I/M") field managers regularly meet with their Installation & Maintenance technician teams. The purpose of these meetings is to exchange information to improve efficiencies, to identify roadblocks impacting I/M work and to encourage communication between managers and their network teams. During the July – December timeframe, employees identified several issues which could impact performance on the out of service metric, including dispatch hold times and coordination for special access arrangements, travel time between jobs, service orders not closed out in the GCAS system, weather conditions such as rain, truck repairs, cable issues such as a defective cable pair on a work ticket, central office coverage and equipment availability at remote central offices.

Timetable: As AT&T mentioned in its monthly exception reports, AT&T struggles to meet the out of service metric as currently designed because the metric does not exclude causes outside of AT&T's control, such as adverse weather and third party events. In addition, historically, AT&T's calculation of performance on the metric continues to be a conservative one, and therefore under the current reporting methodology and reporting structure, showing results with the use of exclusions may not materially improve performance.[1] As AT&T has explained, AT&T does not believe that it can propose a meaningful timetable to meet the out of service metric in the absence of revisions to the existing quality of service standards and the current service standard reporting.

Until those changes are implemented, however, AT&T will continue to strive to meet the current metric, and will continue its enhanced reporting. AT&T will work with the Department and other parties in the pending rule making proceeding to establish metrics that are reasonable and appropriate in light of the current competitive telecommunications market in Connecticut.

[1] This anomaly is caused by the way in which performance on the metric is calculated. In calculating its performance on the out of service metric, AT&T excluded trouble tickets that occurred on a Sunday or holiday from both the numerator and denominator of the equation. Depending on the volumes, in certain cases, exclusions from both the numerator and denominator might result in a lower percentage performance or have a minimal impact on performance results.

Below are the additional steps and timelines that AT&T has and will deploy in an effort to meet the OOS metric.

Proposed Timeline/Steps to Meet OOS Metric

March – November 2010: Because the out of service metric in Connecticut does not exclude trouble tickets caused by adverse weather events and third party caused trouble, historically AT&T had not tracked these events or required its technicians to code for such events. In 2010, AT&T implemented a manual trouble exception coding system in Connecticut, and trained its service technicians on the appropriate use of specific adverse weather codes and third party cause codes when conditions warrant such coding. AT&T had anticipated that such coding would be sufficient to demonstrate that AT&T would meet the out of service metric with exclusions for out of trouble tickets caused by adverse weather, third party events and Sundays and holidays by August 2010. This did not occur, and we will continue to evaluate the reasons it has not.

December 2010 – March 2011: AT&T will place increased emphasis on tracking use of all codes including adverse weather and third party caused codes by technicians to ensure that the technicians are using the codes appropriately when warranted. AT&T will increase training and coaching of technicians on appropriate use of these codes.

A. TECHNICAL SERVICE

Repair/Installation Field Repair:

1. Training: We have an extremely aggressive Training schedule that started January 2010 and continues through 2011. Courses include Enhanced Loop Maintenance for U-verse Support, Cable Fault Location and Repair, and DSL Installation. Our goal through our training is to improve our repair intervals and quality by having one technician complete installation and repair of customer lines without having to refer or pend the ticket. This results in a larger pool of qualified Technicians to draw from and should have a positive impact on our repair clocks and response times.
2. Vehicles: We have added 30 new CNG Repair vans to our fleet eliminating aging Dodge and Chevrolets. These new vehicles have eliminated breakdowns providing improved on-time performance for our customers.
3. Equipment: We continue to invest capital dollars in new equipment necessary to support our new IPDSLAM and Pair Bonding options for our High Speed Internet Services, as well as, U-verse support. Providing Technicians with the proper tools and training will assist us in accurately isolating troubles, and upon repair, ensuring through test results, the line is fixed.
4. Technician Qualifier Inventory: We have recently completed detailed analysis on completed training and Technician qualifiers. When a Technician completes formal training, we want to ensure we incorporate those new skills on that type of work skill the Technician received in training. The result of the inventory added many more trained and qualified technicians to our current T-1, DSL, and U-verse support complement. This alone will sharply reduce our dispatch durations and provide a better repair interval.

Dispatch Center

The "Flex Force" program has been enhanced to allow us to more quickly and aggressively react to heavy repair load situations. Specifically, these changes are designed to accelerate our response to out-of-service trouble and increase available resources when extended out-of-service conditions exist.

B. OUTSIDE PLANT ENGINEERING

Focus Rehab Program

The Rehab Analysis Organization (RAO) is now in charge of rehabilitation. AT&T continues to utilize a new system to track and identify trouble locations across the state. Fifty-two capital rehab projects were completed in 2010, with a capital investment of $1,175,658 dollars.

Project Light Speed

In 2010, AT&T continued the work originated in 2006, preparing the OSP network for the U-verse service platform, which provides video service using VDSL technology, high speed internet and voice service over fiber to the node architecture leading to better overall customer service. As part of the plant preparation, records are purified and copper pairs are conditioned and dedicated between the serving area interface and the customer serving terminal. The purification and plant dedication efforts improve the network benefitting both wireline and advanced services customers and lead to better assurance that facilities are readily available when customers request service, thus reducing the need for costly short term plant reconfiguration work. Higher quality service and reduced volume of trouble reports helps to mitigate plant problem items; for example, ready access terminals and soft sided closures are identified and replaced where work is required for conditioning.

eARC (Executive Activity Reduction Committee)

The Outside Plant Improvement Committee (OSPIC) was replaced with the Executive Activity Reduction Committee (eARC). There is also the Activity Reduction Committee (ARC). These teams meet monthly and discuss/partner what can and needs to be done in a specific geography to perform activities more efficiently.

C. SWITCHING – CENTRAL OFFICE

Switched Network Reliability

The switched network reliability goal of 0.5 switch minutes outage per access line was again surpassed with an actual 2nd half of 2010 result of 0.01 minutes per access line. Internal process indicators demonstrate that the inside network is operating and maintained proficiently

D. CUSTOMER SERVICE - CONSUMER

Total Consumer accessibility from July through December 2010 was 92%. Accessibility measures the percentage of customer calls that are answered.

While the calling patterns of our customers fluctuate, AT&T continues to examine ways to increase access into our Service Centers. Every effort is made to utilize the service representative workforce to meet our customer demand. Additionally, increased Overtime, schedule adjustments and use of alternative work schedules were utilized to augment the workforce.

E. CUSTOMER SERVICE - BUSINESS

E-Commerce

AT&T continues to work towards a paperless environment for our business customer. We realize that providing our customers with on-line services is key in reaching that goal. We continue to provide to the Connecticut Small Business customer viable alternatives for full service. Our customers have the ability to utilize the local 800 number to reach our Call Center, but tracking data indicates that business customers in the East have also continued to embrace our on-line applications for service fulfillment. During 2010, the Small Business customer increased usage of our e-Commerce Services by 4%, with an average usage of 17% (Jan-Nov data).

Training – Product Expansion

We have continued to expand our Wireless business portfolio, and in doing so, trained our service representatives on the expanded products and services. These products were all supported with enhanced training that has allowed us to better identify a customer's need and position our products/services so we can continue to serve the customer as a One Stop Shop for both wireline and wireless needs.

Adherence

We continue to work to support our incoming call volume. Throughout the year we have stressed accountability and responsibility to our customers. We have worked to balance administrative support clerical activities (order preparation, billing adjustments, etc.) to quality call handling. Where possible, we have addressed down-loading and re-positioning of support functions. We continue to work on call handling time. Emphasis has been placed on overlapping skills and call time usage. Average Speed of Answer – Calls answered within 20 seconds of being presented by the customer– 95%.

Customer Satisfaction

Customer satisfaction continues to be measured by the NOT – an internal National Observation Team and customer telephone evaluations. We have utilized customer feedback to help support and create individual employee coaching and development plans. In some cases customer feedback has helped to address and improve internal process flows, streamlining steps that help to eliminate repeat customer calls. Customer Satisfaction – 82.88% meeting target.

84 Months of AT&T Excuses

(Retrieved from DPUC Docket NO. 99-07-28 documents
submitted by AT&T)

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of February, March and April of 2001. However, improvement continues to be seen during April. The three-month improvement trend is an outcome of the Telco's task force review of procedures and process flows regarding service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of March, April and May of 2001. Unfavorable weather conditions caused an increase in the volume of customer service problems during the month. The Telco's task force continues to review procedures and process flows regarding service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of June, July and August of 2001. There were a significant number of rain and thunderstorm events with some areas receiving rainfall that is considered above normal causing an increase in customer service problems. The Telco's task force continues to review current practices and streamline process flows regarding service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of July, August and September of 2001. However, September results improved significantly due, in part, to the Telco's continued outside plant stabilization program that has resulted in the reduction of trouble volume. In addition, the Telco's task force has identified gaps in process flows and has begun to implement new procedures regarding service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of September, October and November of 2001. However, November results continue to improve to a great extent, due in part to the Telco's continuous outside plant stabilization program. This course of action has had a positive impact on reducing the trouble volume. Additionally, the Telco's task force has implemented new procedures regarding service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of October, November and December of 2001. The Telco continuously works to improve the outside plant stabilization program. The goal of this program is to reduce trouble volume and minimized the duration of any service outage.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of December of 2001, January and February of 2002. The Telco continues with its outside plant stabilization program. The intent of this program is to reduce trouble volume. Additionally, the Telco's task force has implemented new procedures concerning service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of January, February and March of 2002. The Telco remains committed to improving its performance in this category through its outside plant stabilization program. Moreover, the Telco strives to develop and implement new procedures concerning service interruptions.

* Jan and Feb results have been restated from the previous month's report due to a programming instruction error in the processing of the raw data.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of February, March and April of 2002. The Telco is committed to improving the performance in this category through the outside plant stabilization program. Additionally, the Telco is involved in developing and implementing new procedures to minimize the duration time when customers experience service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of April, May and June of 2002. Heavy rain and severe thunderstorms caused the volume of customer service problems to increase during June. Some areas received rainfall that is considered above normal causing an increase in the number of customer service problems. The Telco continues its dedication both to the outside plant stabilization program and implementing new procedures to minimize the time it takes to restore customer's service.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of June, July and August of 2002. August results slightly declined due to thunderstorm activity that ran above normal for the month of August. The activity included some heavy rain events throughout the state causing an increase in the out-of-service repair volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of July, August and September of 2002. September results declined due to a widespread, damaging wind event and several heavy rain and flash flood events that occurred during the month. These activities throughout the state caused an above average out-of-service repair volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of August, September and October of 2002. October results declined due to a major Nor'Easter event and the long duration of heavy rainfall that occurred during the middle of the month. Both of these storms throughout the state caused an above average out-of-service repair volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of September, October and November of 2002. However, November results improved despite an ice storm and very early season heavy snowfall event that took place during the month. The ice storm caused an above average out-of-service repair volume across portions of the Northwest, Central and Southwest zones of the state.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of November, December of 2002 and January 2003. However, January results significantly improved from December due primarily to the Telco's outside plant stabilization program. This program aims at having a positive influence on reducing trouble volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of December of 2002, January and February 2003. However, February results continue to improve despite a blizzard like storm that struck the region during the month. It is evident the Telco's outside plant stabilization program has had a positive influence on reducing the company's trouble volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of January, February and March 2003. March results lapsed due to just about every type of weather event that occurred during the month. Heavy snow, heavy rain, very cold temps, spring warmth and even thunderstorms took place during March. The monthly precipitation was above normal for March, causing a higher volume in OOS troubles throughout the state.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of February, March and April 2003. However, April results improved from March due in part to the Telco's outside plant stabilization program. The Telco remains committed to improving performance by continuing this initiative that addresses service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of March, April and May 2003. May results continue to improve from April due in part to the Telco's outside plant stabilization program. However, severe thunderstorms occurred during the end of the month, which produced rainfall totals of 4 inches causing flash flooding in central Hartford County. This widespread severe thunderstorm event caused a higher than normal out-of-service trouble volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of April, May and June 2003. June results declined due to heavy rainfall events that produced a monthly precipitation that totaled almost 3 inches above normal. A severe thunderstorm occurred during the end of the month, which produced locally heavy rains, strong gusty winds and small hail in some areas. These storms caused a large out-of-service trouble volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of May, June and July 2003. However, July results rebounded despite some heavy rainfall and severe thunderstorm events that occurred throughout the month. The Telco is committed to the outside plant stabilization program. It is believed that this program will improve the Telco's performance in this measurement.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of June, July and August 2003. July results declined due, in part, to numerous thunderstorm events that occurred during the month. The monthly rainfall total for the state was more than 1.2 inches above normal. The Telco remains committed to the outside plant stabilization program. The key goal of this program is to improve the Telco's performance in this measurement.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of July, August and September 2003. September results declined due primarily to the fact that September had the greatest number of days with rainfall in a month ever experienced in the State. The monthly rainfall total for the state was more than 4.1 inches above normal. The winds from Hurricane Isabel also affected the Telco's results. These factors caused an increase in the out-of-service trouble volume.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of August, September and October 2003. October results improved over September results despite some damaging high wind and heavy rain events that occurred throughout the month. The monthly rainfall total for the state in October was once again above normal. Intense rainfall rates, scattered lightning strikes and strong wind gusts up to 60 mph were common during some storm events. These disruptive events caused an increase in out-of-service troubles.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of September, October and November 2003. November results declined from last month due, in part, to some strong wind and heavy rain events that took place throughout the month. Heavy rainfall and strong wind gusts up to 55 mph raked the entire state during some of the individual storms. These irrepressible events caused an increase of out-of-service troubles during November.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of December 2003, January and February 2004. February results slightly declined from last month due, in part, to some heavy mixed snow and freezing rain events that occurred during the beginning of the month. Significant street and urban flooding was noted due to blocked drains which caused an increase in out-of-service troubles.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of January, February and March 2004. March results significantly improved from last month despite a heavy rainfall event that occurred toward the end of the month. The Telco remains committed to improving the performance in this category by implementing and developing new procedures that will minimize the duration time when customers experience service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of February, March and April 2004. April results significantly dropped from last month due to some very significant rainfall events that occurred along with a few thunderstorm episodes during the month. The rain events produced rain totals in excess of 4 inches in some locations throughout the state. Numerous thunderstorms developed within the rain areas and enhanced the already heavy rainfall intensity. The heavy to excessive rainfall events caused a spike in the out-of-service trouble volume affecting the result in this measurement.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of March, April and May 2004. May began the month with a significant rainstorm, that was followed by localized, strong to severe thunderstorm events. Disruptive conditions also occurred toward the later part of the month with some areas of the state experiencing large hail and wind damage. The Telco remains committed to developing and implementing new procedures that will minimize the duration time when customers experience service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of May, June and July 2004. During the month of July, the state experienced above normal rainfall and thunderstorm activity. The statewide rainfall average of 4.58 inches was 0.76 inches above normal. The Telco remains committed to developing and implementing new procedures that will minimize the duration time when customers experience service interruptions.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of June, July and August 2004. The state experienced above normal rainfall for the month of August. The statewide rainfall average of 5.32 inches was 1.41 inches above normal.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of July, Aug and Sept 2004. For the third month in a row, the state experienced above average rainfall as a result of several tropical disturbances. Rainfall during the month of September was 4.36 inches above the statewide average of 8.19 inches.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of Aug, Sept and Oct. 2004. However, with less weather events occurring in the state during the month of October, the Telco showed a 10% improvement over its August and September reporting for OoS Repair cleared within 24 hours.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of September, October and November 2004. However, the results for November showed improvement over September and October.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of October, November and December 2004.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of December 2004, January and February 2005. However for the month of February, the Cleared W/I 24 Hour result significantly improved compared to January due to a substantial decrease in Network Out of Service Troubles statewide.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of January, February and March 2005. However, for the month of March, the Cleared W/I 24 Hour overall result improved for the second consecutive month despite the most winter-like March weather experienced in many years.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of February, March and April 2005. The Company experienced a significant increase in Out of Service troubles for the month of April due to higher precipitation levels. The statewide precipitation average was considerably above the norm, and much greater than the averages for February and March.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of March, April, and May 2005. The Company's overall improvement in May compared to April was influenced by a moderate decrease in Out of Service troubles.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of April, May and June 2005. The company's overall decline in June compared to May was influenced by an increase in Out of Service troubles.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of May, June and July 2005. The Company's overall decline in July compared to June was affected by a significant increase in Out of Service troubles. This was influenced by a statewide total precipitation average substantially above normal for July.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of June, July and August 2005. The Company's overall improved result in August compared to July was affected by a decrease in Out of Service troubles. This was influenced by a statewide total precipitation average that was below normal for August.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of July, August and September 2005. The Company's overall improved result in September compared to August was affected by a decrease in Out of Service troubles. This was influenced by a statewide total precipitation average below normal for September.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of August, September and October 2005. The Company's lower result in October was affected by the almost continuous rainfall for one-third of the month. The state experienced over three times the normal total precipitation average for October, with certain areas of the state recording between 14 and 16 inches of rain.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% during the months of September, October and November 2005. The Company's overall improved result in November compared to October was affected by a decrease in Out of Service troubles.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from December 2005 through February 2006. However, the Company's higher overall result in February compared to January was influenced by a decrease in the statewide average precipitation and a decline in OOS troubles.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from January through March, 2006. The Company's higher result in March compared to both January and February was influenced by very low statewide average precipitation and a significant decline in OOS Mean Time To Repair.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from February through April, 2006. The Company's lower result in April compared to March was influenced by above normal statewide average precipitation and a moderate increase in OOS Mean Time To Repair.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from March through May, 2006. The Company's lower result in May compared to April was influenced by statewide average precipitation significantly above the norm which contributed to appreciable increases in OOS troubles and Mean Time To Repair.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from April through June, 2006. The Company's lower result in June compared to May was influenced by statewide average precipitation over twice the norm which contributed to a significant increase in OOS Mean Time To Repair.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from May through July, 2006. This 3-month period has been marked by weather conditions that increased the OOS troubles.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from June through August, 2006. The higher result in August compared to July was influenced by the Telco's focus on and resulting significant reduction in OOS Mean Time To Repair. This result occurred in spite of a high number of OOS troubles affected by a statewide rainfall average nearly two-thirds above the norm for August.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from August through October, 2006. The higher result in October compared to August and September was influenced by significant decreases in OOS troubles and OOS Mean Time To Repair. This improvement reflects the Telco's commitment to implement additional initiatives for this measure.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from September through November, 2006. The higher result in both October and November compared to September was influenced by decreases in both OOS troubles and OOS Mean Time To Repair. This improvement reflects the Telco's commitment to implement additional initiatives for this measure. The result for the fourth quarter of this year will be significantly improved compared to the third quarter.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from November 2006 through January 2007. The higher result in January compared to December reflects another considerable decrease in OOS Mean Time To Repair. The significant overall improvement that began in the 4th quarter, 2006 has continued into 2007, a result of the additional initiatives implemented by the Telco for this measure.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from December, 2006 through February, 2007. The higher result in February compared to January reflects significant decreases in OOS Mean Time To Repair and OOS troubles. This continuing improvement reflects the additional initiatives for this measure implemented by the Telco in the 4th quarter, 2006.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from January, 2007 through March, 2007. The slightly lower statewide result in March compared to February reflects a significant increase in OOS troubles, however, OOS Mean Time to Repair remained close to the low February level. The overall quarterly result (81.5% cumulative) is a major improvement over the 4th quarter, 2006, when the Telco introduced additional initiatives for this measure.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from February, 2007 through April, 2007. The lower statewide result in April compared to March reflects increases in both OOS troubles and OOS Mean Time to Repair. This was influenced by a very heavy rainfall event in the middle of the month which led to significant flooding in certain areas of CT. The statewide total precipitation average of roughly 8 inches was almost twice the historical average for April.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from March, 2007 through May, 2007. The improvement in May compared to April reflects significant decreases in OOS troubles and OOS Mean Time to Repair; this was aided by a statewide rainfall average of just under two inches, nearly half the historical average for May. The almost 81% year-to-date cumulative result for this measure is 25% higher when compared to the same period last year.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from April, 2007 through June, 2007. The decline in June compared to May reflects significant increases in OOS Mean Time to Repair and OOS troubles. However, the 78% year-to-date cumulative result for this measure represents a vast improvement over 54% for the same period last year; this reflects additional initiatives introduced by the Telco in the 4th quarter, 2006.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from June, 2007 through August, 2007. The overall increase from July reflects modest decreases in both OOS Mean Time to Repair and OOS troubles. This was aided by a statewide total rainfall average nearly half the historical average for August. Cumulatively, the statewide year-to-date result for this measure is 74.9% compared to 51.7% for the same period last year.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from May, 2007 through July, 2007. For July, the slight overall decline from June reflects small increases in both OOS Mean Time to Repair and OOS troubles. The 64.6% July result compares to 44.1% in July, 2006. Cumulatively, the statewide year-to-date result for this measure is 75.9% compared to 52.1% for the same period last year.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from July, 2007 through September, 2007. The overall increase from August reflects significant decreases in both OOS Mean Time to Repair and OOS troubles. This was aided by a statewide total rainfall average substantially below the historical average for September. Cumulatively, the statewide year-to-date result for this measure is 75.2% compared to 50.9% for the same period last year.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from August, 2007 through October, 2007. The overall decline from September reflects significant increases in both OOS Mean Time to Repair and OOS troubles. This was influenced by rain events during the first half of the month. It is expected that the November result will improve from October and be close to that of August. Cumulatively, the statewide year-to-date result for this measure is 73.2% compared to 51.9% for the same period last year.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from December, 2007 through February, 2008. The overall decline from January reflects increases in both OOS Mean Time To Repair and OOS troubles. This was influenced by a statewide total precipitation average of approximately seven inches, over twice the historical average for February.

Explanation: AT&T did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from January, 2008 through March, 2008. The overall result for March was slightly improved from February, reflecting a decrease in OOS troubles while OOS Mean Time To Repair increased.

Explanation: AT&T did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from February, 2008 through April, 2008. The overall result for April improved from March, reflecting decreases in OOS troubles and OOS Mean Time To Repair.

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% for March, 2008 through May, 2008. The overall result for May was slightly improved from April, even with the statewide total of almost 2.5 inches more of rainfall in May.

Explanation: AT&T did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% for April, 2008 through June, 2008. The overall result for April and May showed a considerable improvement over March (48.2%). In June, the volume of OOS troubles increased by 27.9% over May. Also, June was a hot month with nine consecutive days over 80 degrees, four days of which were over 90 degrees.

AT&T's performance with regard to this metric should be viewed in the context of its overall excellent quality of service. For example, as part of its ongoing Project Lightspeed program, AT&T is conditioning its existing plant, including replacing equipment as necessary. This effort continues to result in better service quality, better availability of facilities, and fewer trouble reports. AT&T's generally excellent quality of service is further evidenced by its consistently excellent performance on other service standards as well as its excellent and continually improving performance as measured by the Consumer Scorecard issued by the Department.

JOB TITLE	2001	2002	2004	2005	2006	2007	2008	2009	2010	2011	2012	Total
COMPUTER SYS SPEC									2			2
CIRCUIT DESIGN TECH	5	3					20					28
CUSTOMER SERVICE TECH	9	18					32				1	60
SERVICE DELIVERY TECH	41	21						11				73
PUBLIC COMM SPECLST	4											4
SERVICE REP	22			12	17		54					105
NTWK TRANSLATOR	5	1					1	3	24			34
MAINT ADMINSRTR	14				7		160					181
NTWK ADMIN ASSC	3						23					26
DATA ASSUR TECH	2						1		5			8
GEN OFF ASSC	3	2	1		5	3	10	6	3			33
OPERATOR	32									100		132
SERVICE ORDER REVIEWER	10				1	1	2	7				21
SUPPORT SPECLST		8		3								11
ASSOC TEL SPECLST-COND		1										1
OUTSIDE NETWORK DESIGN		6	2								8	8
TELECOMM SPEC-ONE		10	9				21				13	40
ASSIGNMENT ADMINSTR		13					38					51
CONSTR OFC ADM		2					4				3	9
FACILITY ASSGNR		15	5								3	23
SITE AQU AGT		2										2
TECH ASST-CPC		1					3					4
TECH ASST-GTAS		3										3
OFFICE ASST		1										1
PROV ASST-DFCC		2										2
EMERGENCY POWER TECH											1	
NETWORK TECH-ELECTR		16				7	10	8			18	59
CENTRAL OFF ATTEDNT		14					21	20	8			63
SR FRAME ATTEDNT		1					1		1			3
CONDUIT INSPECTOR		1										1

NETWORK DELIVERY TECH		21										21
NETWORK DEPLOYMENT TECH		62					80					142
JOB TITLE	**2001**	**2002**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**Total**
OUTSIDE PLANT TECHNICIAN		20					46					66
INSTALLATION REPAIR TECH		50							80			130
MAIL ADMIN ASST		1										1
MATL DIST DRIVER		1			1							2
SUPPLIES ATTENDANT		3					2		4			9
PUB COMM CONSULT PCS		1				1						2
PAY TELEPHONE TECH		1			4	3	6					14
COIN TEL COLLECTOR		1			3	2	1					7
BILLING INVEST REP			27				1					28
SVC NEG ANALYST			3									3
TREAS BOOKKEEPER-RPC			2									2
ADMIN SVCS REP-ITC			2			1						3
BALNCG ADMIN REP-RPC			10									10
BILL PAYMENT PROCESS-RPC			14									14
SVC ORDER REV-DBAC			1									1
INVEST ASST-DBAC			8									8
SALES ASSC					31							31
CASHIER					9							9
SERVICE CONSULT				2	5		2	7	2	6		24
SERVICE REP OCC					28		2	10	29	5		74
ENG ASST-BDLG-REAL ESTATE				1		5						6
SPEC SERVICES REP-CORP TLCM						1						1
NETWK TECH-MINI COMP											2	2
PLACEMENT ASSTS						3			1			4
BIILING SERV REP							25					25
SR BILLING SERV REP							3					3
MAINT ADM -SPAN							2					2
PROCESS SUPPORT CNTR ADM			58				1					59
NETWK CONTROL ADM							5					5

SCHEDULING ADM							1					1
COIN TELE CONTRL SCHEDULER							1					1
JOB TITLE	**2001**	**2002**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**Total**
COIN TELE TELLER							1					1
OFFICE ASST-COIN TEL							1					1
STATISTICAL ASST							1					1
REGULATORY OFFICE ASSC							1					1
FINANCIAL ASST							1					1
MOTOR EQPT INSP-MAIN			4									4
PUBLSHG SUPP ASST							10					10
ARTIST							10					10
SALES SUPP ASST							2					2
AD COPY EDITOR							3					3
CUST RELATIONS REP							6					6
TOLL ASSOCIATE							4					4
ALL DISTANCE SPECIALIST							2	3		5		10
SERVICE REP PSP							2					2
SERVICE REP SPAN							1					1
ADMIN ASSISTANT-IVR							1					1
OUTSIDE NETWORK ENG							8					8
TECH ASST-ONE							11			15	3	29
TELECOMM SPEC-INE								4			5	9
TELEPHONE SALES SPEC								3	6			9
ACCESS SRVREQ CORR											1	1
TECH ASST- INE								1				1
DATA ASSUR TECH-911									2			
AUTO MESSENGER									1			1
MAIL SERVICE MESSENGER									4			4
MATERIAL&LOGISTIC ASSIST.									1			1
TELEMARKETING SPECIALIST								3				
ENG AIDE COMNLANG/ROUT COR								1				

TOTAL	150	300	146	18	110	27	644	88	176	31	58	1748